



September 6, 2023

Via ECF

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: **KRISTINA MIKHAYLOVA V. BLOOMINGDALE'S, INC., et al.**  
*Case No. 19-8927*

Dear Judge Daniels,

I represent Plaintiff, Kristina Mikhaylova in the above-referenced matter. With the consent of Defendants' counsel and for the reasons set forth below, I respectfully request a one week, seven (7) day extension to the Defendants' Motion for Summary Judgment briefing deadlines and to extend the deadline for Expert Discovery until October 31, 2023. This is Plaintiff's fourth and final request. Your Honor previously granted Plaintiff's third request. (Dkt. No. 119).

I respectfully make this request due to the unforeseen hurricane Idalia that caused disruptions here in Florida. Defendants do not object to a seven (7) day request for an extension provided the Court also grants Defendants an additional extension to take the deposition of Plaintiff's expert, Dr. Frankel from September 25, 2023 to October 31, 2023. We respectfully make this request due to Plaintiff's expert's personal commitments including moving again and religious observances as well as scheduling conflicts with Defendants' counsel's commitments.

Accordingly, we respectfully request the following briefing and discovery schedule:

	Current Deadline	Proposed Deadline
Plaintiff's opposition due	September 11, 2023	September 18, 2023
Defendants' reply due	September 25, 2023	October 2, 2023

	Current Deadline	Proposed Deadline
Expert Discovery Deadline	September 25, 2023	October 31, 2023
Completion of Fact Discovery deadline	October 2, 2023	November 7, 2023

I thank Your Honor for your consideration in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Melissa Mendoza", written over a horizontal line.

Melissa Mendoza, Esq.

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cc: Via ECF

Betty T. Tierney (Counsel for Defendants)

Steven Gerber (Counsel for Defendants)